



Taimur Alamgir
talamgir@kdvlaw.com

Kaufman Dolowich & Voluck, LLP
135 Crossways Park Drive, Suite 201
Woodbury, New York 11797
Telephone: 516.681.1100
Facsimile: 516.681.1101
www.kdvlaw.com

November 14, 2021

VIA ECF

Honorable Jesse M. Furman, U.S.D.J.
United States District Court
40 Foley Square
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to
terminate ECF No. 142. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Jesse M. Furman".

November 15, 2021

Re: *Chen, et al. v. Matsu Fusion Restaurant Inc., et al.*
S.D.N.Y. Case No.: 19-CV-11895 (JMF) (SN)

Your Honor:

Our firm represents Defendants Matsu Fusion Restaurant Inc., Apex Japanese Restaurant Inc., Yi Chang Chen, and Hiu Yin Lam (the "Matsu Defendants").

This letter is respectfully submitted, upon consent of counsel for all parties, to request an extension of the November 18, 2021 deadline for dispositive motions or a joint pre-trial order ("JPTO") (ECF No. 135), until **January 31, 2022**. This is the first request for extension of the aforementioned deadline. No other dates or deadlines will be affected if this application is granted.

Pursuant to Your Honor's referral, Magistrate Judge Netburn has scheduled a settlement conference on January 3, 2022. This extension is sought as it would permit all parties to devote their attention to a potential settlement (as opposed to the litigation) and conserve resources in advance of the settlement conference. Further, as our firm was only recently retained to represent the Matsu Defendants, we require additional time to assess how the Matsu Defendants should proceed with respect to the deadline referenced above.

We thank the Court for considering this consented application.

Respectfully Submitted,
KAUFMAN DOLOWICH & VOLUCK, LLP

A handwritten signature in blue ink, appearing to read "Taimur Alamgir".

By: _____
Taimur Alamgir

cc: All Counsel (via e-mail)